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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

RICHARD VELA, an individual,

Plaintiff,

vs.

CDI CONTRACTORS, LIMITED
LIABILITY COMPANY;
EMPLOYEE(S)/AGENT(S) DOES 1-10; and
ROE CORPORATIONS 11-20, inclusive,

Defendants.

Case No. 2:15-cv-01230-JAD-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND
TO DEFENDANT'S PARTIAL MOTION
TO DISMISS AND REQUEST TO
VACATE HEARING**

(FIRST REQUEST)

Pursuant to LR 6-1, 6-2, and 7-1, Plaintiff Richard Vela ("Plaintiff") and Defendants CDI Contractors, Limited Liability Company ("Defendants"), by and through their respective counsel, have agreed to an extension of time of 30-days for Plaintiff to file a response to Defendant's pending partial Motion to Dismiss (Doc. # 2), which was filed on June 29, 2015. The current deadline for Plaintiff to file a response is July 16, 2015. The 30-day extension would result in a new filing deadline of August 17, 2015 (technically, 30-days would be August 15, 2015, however, that is a Saturday).

The parties also respectfully request that the Court vacate the August 3, 2015 hearing date

1 on the motion.

2 The purpose of these requests is to provide the parties with an opportunity to engage in
3 early settlement discussions without incurring what may be unnecessary fees and costs in
4 connection with law and motion.

5 This is the parties' first request.

6 Accordingly, the parties hereby stipulate and agree as follows:

7 IT IS HEREBY STIPULATED that Plaintiff will have up to and including August 17,
8 2015, to file a response to Defendant's partial Motion to Dismiss (Doc. # 2).

9 IT IS FURTHER REQUESTED that the Court vacate the August 3, 2015, hearing date on
10 the Motion.

11 This stipulation is made in good faith and is not intended for purposes of delay, but in the
12 interest of judicial economy to allow the parties to further early settlement discussions without
13 incurring attorneys' fees and costs through law and motion.

14 Dated this 14th day of July, 2015.

Dated this 14th day of July, 2015.

15 JEFFREY GRONICH, ATTORNEY AT LAW,
16 P.C.

OGLETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.

17 /s/ Jeffrey Gronich

/s/ Suzanne L. Martin

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Attorneys for Defendants

22 ORDER

23 IT IS SO ORDERED.

24 The hearing on [2] Motion to Dismiss is reset to September 21, 2015, at 11:00 a.m. in LV
25 Courtroom 6D before Judge Jennifer A. Dorsey.

26 
UNITED STATES DISTRICT COURT JUDGE

27 July 16, 2015.

28 Dated